# **Division of Grants Administration**



# POLICIES AND PROCEDURES MANUAL FOR ON-THE-JOB TRAINING (OJT)

**Revised MAY 2009** 

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# **On-The-Job Training Program**

#### I. Introduction

The goal of the On-the-Job Training (OJT) program is to place participants in occupations that will enhance their prospects for long-term employment, maintain or increase their wage levels and ultimately permit them to become self-sufficient. OJT involves the acquisition of specific skills and employment competencies, through exposure in an actual work setting, to the processes, work tasks, tools and methods of a specific job or group of jobs. It is an ideal "hands on training" learning method for adults who will build on skills and knowledge already mastered while acquiring new skills. Participants should not enter into a work site as either over-qualified or under-qualified for the position. Minimum and maximum entrance criteria for specific jobs will be established and candidates will be matched appropriately through the process of objective assessment. The training experience is designed around specifically identified tasks and skills required by an employee to satisfactorily complete the job. OJT may be sequenced with or accompanied by other types of training such as classroom training or literacy training.

# II. Employer Outreach

The Marketing Manager working in cooperation with the OJT Coordinator and Career Center Director to produce a variety of OJT marketing materials and to design an outreach strategy that will include:

- Brochures: One for Employer Outreach and One for Job Seeker Outreach
- Business Services Unit Employer packet inserts providing an overview of OJT program
- Website link and Overview of OJT Program
- News releases for print and broadcast media announcing OJT program Release in multiple print vehicles including Spanish papers
- VWCC Newsletter articles featuring "success stories" and other related topics
- Flyers
- OJT announcement on marquee at both centers
- Email distribution of OJT activities and opportunities

Marketing materials will be made available to Business Service Representatives for employer visits; Career Services Advisors and Job Developers for job seeking customers; Waiting room and Resource Room areas at both centers as promotional material(s). In addition, materials will be displayed off site when appropriate at chamber events, job fairs and at other events/programs sponsored either by the Career Center or those events that are attended by Career Center staff.

# III. Plan/Strategy with Business Service Unit

The Business Service Unit will make employers aware of the OJT program through their presentation of promotional literature at company visits and during other points of contact such as business expos, chamber of commerce events, etc. When an employer expresses an interest in OJT participation, the BSU representative will ask the employer to complete a Pre-Screening Employer Eligibility questionnaire (Attachment A).

The BSU representative gives the completed questionnaire to the OJT Coordinator who will contact the employer and arrange a convenient time to meet with and interview the employer and complete an Employer Eligibility questionnaire (Attachment A). If the employer is found eligible, the OJT Coordinator will accept a job description for the proposed OJT. The OJT Coordinator will review the job description for viability as an OJT. The OJT Coordinator will work with the Employer to identify the baseline entry level criteria necessary for a prospective participant, and review all material for acceptability as an OJT program. If approved, the OJT Coordinator will then assist the employer in completing a Master Training Plan and Timeline. The OJT Coordinator will also review and discuss program criteria, performance goals and will evaluate the employment site for participant enrollment. The employer will be informed of paperwork requirements and contractual procedures, including the necessity of on-site monitoring, the completion of training plan reports, the completion of time/attendance sheets, payment vouchers and other forms for reimbursement.

Working with the OJT Coordinator, the employer will provide information in four components that includes general business information, program description, master training plan and reporting requirements. This information will be included in an initial review package for acceptance as an OJT.

The OJT Coordinator will ensure that the necessary paperwork has been completed thoroughly and accurately. The Coordinator will work with the employer to resolve any outstanding issues. When an employer does not meet the established provider criteria, the package will still be submitted as described above and will be kept on file for future reference in the event that denial of eligibility is appealed.

The OJT Coordinator will collect all information and route to VWCC and DTD Management for review and approval (<u>Attachment B</u>).

# IV.WIA Employee Safeguards

- (a) A participant in a program or activity authorized under title I of WIA must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee (as of the date of the participation).
- (b) A program or activity authorized under title I of WIA must not impair existing contracts for services or collective bargaining agreements. When a program or activity authorized under title I of WIA would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the program or activity begins.
- (c) A participant in a program or activity under title I of WIA may not be employed in or assigned to a job if:
  - (1) Any other individual is on layoff from the same or any substantially equivalent job;

- (2) The employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the WIA participant; or
- (3) The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.
- (d) Regular employees and program participants alleging displacement may file a complaint under the applicable grievance procedures found at Sec. 667.600 of this part. (WIA sec. 181.)

# V. Participant Eligibility

Customers who have been determined eligible as WIA Title I Dislocated Workers or Low Income Adults may be considered for the OJT program. This includes Dislocated Workers enrolled in special National Emergency Grant (NEG) programs and/or Trade Programs. OJT contracts may be written for employed workers who are not earning a self sufficiency wage, as long as the OJT relates to the introduction of new technologies, new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes. Attachment C provides the Customer Flow Chart from outreach through placement.

Career Services Advisors and Job Developers will identify customers who will benefit from enrollment into the OJT Program through the objective assessment process. A review of the customer's work history, academic and vocational background to determine marketable skills, strengths and abilities will occur. OJT is not only job and company specific it is participant specific as well. As such the decision to enroll an individual in OJT must be documented in the participant's Career Management Plan (CMP). The customer may be recommended for an OJT position based on the following:

- 1. classroom instruction is not a viable option for customer training;
- 2. the customer possesses initial skills that are transferable to OJT in the labor market:
- 3. the customer's needs (based on his/her individual circumstances/financial background);
- 4. the customer's work readiness potential which can be further developed by an OJT; and
- 5. The customer's skill level.

The CSA will be responsible for creating a Career Management Plan (CMP) through the implementation of the MOSES Case Management Tool. At a minimum, the decision to refer a participant in OJT must be supported by the results of vocational assessment including aptitude, academic and interest testing which conform to the occupation to be trained for; and an evidence of deficiency in job skills, job experience and job knowledge for which the OJT enrollment is designed to remediate. "Reverse Referrals" or the practice of enrolling an employer's referral into OJT should be approached with extreme caution. A particular customer is not to be matched to a particular job until thorough assessments of both the customer's and the employer's need and ability to train have been completed.

OJT is considered as a "training" service under the Workforce Investment Act and as such the customer must receive at least one Core and Intensive Service that has not resulted in employment prior to referral. All OJT candidates will be enrolled into Intensive Services. Customers may elect to register for workshops at ValleyWorks Career Center at any time and will have access to available resources at the career center. The Basic English Skills Test (BEST Test) will be administered for all non-native English speakers who appear to have limited communication skills.

The MOSES system will be used to track customers enrolled in the OJT program for progress and reporting purposes. Employers will be given a course identification number that will be entered in MOSES. Open OJT opportunities will be distributed and announced to staff at staff meetings and/or via email.

# VI. Customer Referral

Career Services Advisors (CSA) will generate OJT referrals to the WIA Services Coordinator. The CSA will submit to the WIA Services Coordinator, the customer's eligibility file, a referral to the OJT program and supporting documentation. The WIA Services Coordinator will conduct a review of the OJT participant file, OJT Referral, MOSES system data and other documents. The WIA Services Coordinator will document any issues on the routing slip and return the package to the CSA for resolution.

The OJT Referral Package should contain the following documents:

- OJT Request Review Form
- MOSES Case Management Plan (signed)
- Customer's Resume
- Labor Market Information (LMI) documentation
- On-the-Job Training Documentation Checklist

The WIA Services Coordinator, upon approval, will forward the OJT Referral Package (<u>Attachment D</u>) to the OJT Coordinator. The customer file will remain with the CSA for appropriate filing. The CSA should make a copy of the OJT Referral Package for the customer file. Case notes should reflect referral to OJT and action taken. The CSA should record referral to training under General Services Screen.

Career Services Advisors may also submit information to the OJT Coordinator regarding customers who may benefit from an OJT experience, and request the OJT Coordinator research businesses that may be interested in the OJT program (to match with the needs of the customer).

# VII. Interviewing Process

The OJT Coordinator will receive the OJT Referral Package for review and approval. The OJT Coordinator will meet/interview the customer and will work to develop a plan for the customer to access an OJT slot.

The OJT Coordinator will contact a potential OJT employer whose position best meets the customer's training requirements and will arrange an appointment for the customer to be interviewed. Following the interview, if the customer is acceptable to the employer, the Coordinator will meet with the employer to finalize the details of the OJT.

The customer and the OJT Coordinator will discuss the results of the interview. Customers who are not accepted by employers will be interviewed by the Coordinator to detail the reasons for non-acceptance. At the same time the Coordinator will review applicable comments from the employer to determine an appropriate strategy for the customer in future interviews and will inform the CSA of all decisions. The customer accepted for entrance into an OJT position will be oriented to the position requirements and details of the OJT training plan.

The Coordinator will emphasize that the customer is not to begin working until a formal contract is in place and approved by all respective parties.

# VIII. OJT Referral Review Process

The Master Training Plan will be job and company specific consisting of an outline detailing the skills or tasks to be learned, method of instruction, number of training hours and the level of proficiency to be demonstrated by the trainee midpoint and upon completion of the program. The employer will be responsible for completing the midpoint and end of training reports on these two occasions and will submit them to the OJT program coordinator for review.

The length of training will vary for each individual on a case by case basis, based on prior experience, education and training. A copy of the job description and/or a verbal description of the occupation from the employer will aid in determining the training time frame. One method of determining the length of training required to perform a job, is to use the O\*NET code, find the Job Zone level in the O\*NET (Example: 21508 = Job Zone 3). Then locate the Job Zone from the chart below. It shows Maximum OJT time reimbursable under WIA for any occupation at a given Job Zone. For Example Employment Interviewer: 21508 has a Job Zone of 3. Read across to see that 1,200 hours is the maximum for any Job Zone 3 occupation.

#### JOB ZONE TRAINING TIME CONVERSATION CHART

Job Zone Level	Maximum Training Time Allowed
1	400 hours
2	800 hours
3	1,200 hours
4	1,600 hours
5	2,080 hours

Alternate Process for determining the length of training:

The following table will convert the current Specific Vocational Preparation (SVP) Code to the new Job Zone Levels.

SVP Range – Below 4.0	Job Zone 1
SVP Range – 4.0 to <6.0	Job Zone 2
SVP Range – 6.0 to <7.0	Job Zone 3
SVP Range - 7.0 to < 8.0	Job Zone 4

This SVP code translates into training hours and can be used as a "benchmark" or point of comparison in developing OJT training plans.

## For example:

#### 203 582 054 **Data Entry Clerk** (clerical) alternate titles; data entry operator

Operates keyboard or other data entry device to enter data into computer or onto magnetic tape or disk for subsequent entry: Enters alphabetic, numeric, or symbolic data from source documents into computer, using data entry device, such as keyboard or optical scanner, and following format displayed on screen. Compares data entered with source documents, or re-enters data in verification format on screen to detect errors. Deletes incorrectly entered data, and re-enters correct data. May compile, sort, and verify accuracy of data to be entered. May keep record of work completed. GOE: 07.06.01 STRENGTH: S GED: R3 M2 L3 SVP: 4 DLU: 89

This Training Plan must be developed before the training begins. When the OJT period in a given occupation varies from the average for that occupation, the basis for the variation shall be recorded in the CMP.

The OJT Coordinator will submit the OJT request for approval. (Attachment D 1: On-the-Job Training Contract Request Form.

The Division of Grants Administration (DGA) Planning Department will negotiate the formal Training Agreement with the employer and will generate a customized voucher payment system for the participant and employer. The Voucher Payment Document/copies will be forwarded to the OJT Coordinator, who will provide copies to the employer. A copy of the Training Agreement will be returned to the Career Services Advisor along with the original OJT referral. These documents will be placed in the participant's file. The OJT training will be given a course identification number and entered into MOSES. The Career Service Advisor will record the enrollment through the MOSES course enrollment screen, capturing start and end dates. The participant's case file will be stored in the main file room along with other enrollment files for the corresponding fiscal year.

Prior to an OJT placement, the Coordinator will meet with the customer again to go over the training plan, employer evaluation, customer monitoring/case management procedure and problem resolution system. The customer will be informed that he or she will be contacted within two weeks of a placement.

#### IX. Fixed Reimbursement Rate

A fixed reimbursement rate will be used for all OJT contracts. Under this system, employers are reimbursed the same proportion of the customer's wage throughout the duration of the contract. The reimbursement during fixed rate contracts may not exceed 50% of the participant's wage. The OJT contract reimbursement rate is 50%. The OJT customer is paid by the employer at the same rate of pay (including periodic increases), as other similarly situated employees or trainees.

The intention is that wages at completion of all full time OJT contracts shall be no less than minimum wage for customers.

# X. Contract Generation

The contract will be generated and approved by the DGA Planning/Fiscal Departments. It will contain:

- Training outline with duration of OJT training
- Program reimbursement and wage information
- Employer information
- Employer Assurances
- Terms and Conditions

Attachment E contains all required contract forms and a boilerplate scope of work. The payment/reimbursement schedule for OJT's will be on a monthly basis. The OJT Coordinator will provide the employer with copies of reimbursement forms and an explanation of the process prior to the start of OJT. On a monthly basis, the employer shall submit a complete and accurate Monthly Employer Reimbursement Invoice, on or before the tenth working day following the end of the previous month. Copies of all supporting documentation (i.e.: payroll registers) must be attached to the Monthly Employer Reimbursement Invoice. The Monthly Reimbursement Invoice must be signed by both the provider and the OJT customer. The final Monthly Reimbursement Invoice must be submitted by the 10<sup>th</sup> working day following the termination date of the contract. The OJT Coordinator will review these forms for accuracy by checking the customer's recorded hours against the pay stubs and after signing off will forward to the fiscal department for payment.

The DGA Fiscal Department will return all incomplete or unsigned invoices to the OJT Coordinator. Unsigned or incomplete invoices will not be paid. Invoices must be submitted in a timely manner.

# XI. Contract Modification

OJT enrollments resulting in a change in the terms of the contract require a contract modification. As seen in Attachment F: Lower Merrimack Valley Department of Training and Development Request for Modification. Such changes could consist of:

- Change in cost
- Change in program design
- Change in contract budget
- Length of training
- Changes in acquired skills
- Changes in contractor reimbursement, i.e. customer gets unexpected raise

The form should be completed by the OJT Coordinator, working in conjunction with the Employer, before contract changes are implemented and submitted at least two (2) weeks prior to the contract termination. It will be submitted to Planning/Fiscal for review and approval. A Contract Modification is then generated for appropriate signatures from both the DTD and the Employer.

# XII. Customer Case Management

The Career Services Advisor will provide case management to the customer while he or she is engaged in training to assist in resolving any workplace issues that may arise. The CSA will ensure that the customer is acquiring the agreed upon skills and is comfortable with their workplace environment. On-going counseling support will be provided to insure that the individual is receiving the services needed to reach the goals established in the MOSES Case Management Plan Tool (CMP). The Case Management Tool will be updated as goals and tasks are achieved and/or modified. An open line of communication with trainee will be maintained during the OJT period. Depending on the specific needs of the trainee, contact may be frequent i.e., weekly.

#### The following suggestions could help to facilitate Case Management:

- Calling during "off" hours, evenings or on the weekend.
- Calling during the customer's lunch hour.
- Having the customer call at a time that has been designated as open "call time".
- Asking the training provider to take a message.
- Meeting with the customer when Supportive Service paperwork is being processed.
- Discussing case management requirements early on in the initial assessment process or while the customer is signing the Obligations for Intensive and/or OJT Services document.
- Encouraging the customer to visit the Career Services Advisor during specific drop-in hours.
- Evening or weekend visits during the career center's operating hours.

Attachment G provides all the necessary case file forms and documentation checklists recommended for use.

# XIII. Customer Support Services

Because an OJT is considered to be a "training" service under WIA, the enrollees will follow the Lower Merrimack Valley Workforce Investment Area WIA Title I Supportive Services Policy for Adults and Dislocated Workers. OJT participants will not be eligible to receive Needs Related Payments due to the acquisition of wages while enrolled in the program.

Supportive Services will be provided only to those customers who are without the means to pay for such services themselves or through other resources. Only after attempts to secure services through other agencies and organizations that offer such services at no cost to the customer have been exhausted will DGA assume the cost. Examples of Supportive Services could be the cost of

a specific license or certification required for employment or tools/uniforms needed to perform on the job.

Supportive Service Requests and Invoices will be generated by the CSA and the WIA Services Coordinator will sign off on the request. It is then processed through the Fiscal Department as outlined in the Supportive Service Policy.

If during the OJT period a problem occurs between the employer and the customer, or if the customer perceives a problem, the Coordinator will contact the employer and customer and try to resolve the problem.

After the OJT training has been completed and the customer is retained in employment he or she will be exited from the WIA program if no longer in need of services. The OJT course completion will also occur at this time, documenting the outcome of the program. The customer will be provided with WIA follow up services as frequently as needed for no less than 12 months after program exit.

Enrollments, terminations, exits and program outcomes will be entered into MOSES and tracked by the Career Services Advisor and customers will be tracked using the existing caseload spreadsheet system.

# XIV. OJT Provider Monitoring

The OJT Coordinator will function as the main point of contact for the employer. He or she will work closely with the employer to resolve any workplace issues or contractual issues that may arise. The OJT Coordinator will communicate with the necessary staff i.e. Fiscal, Planning, Career Services' Advisors, Business Specialists, etc. to resolve issues in a timely manner.

The OJT Coordinator will be responsible for ensuring that the Master Training Plan is updated at the Mid-Point and End of Program Dates. This will be done in conjunction with the Employer. Copies of the plan will be placed in the customer's file.

Monitoring will occur with the Employer and OJT Coordinator on a regular basis and include, worksite visits, phone and/or email correspondence, monitoring of active training plans and contract compliance.

The OJT Coordinator will conduct a minimum of two on-site Employer and Customer interviews prior to the completion of the program. One site visit will occur in the first month. An evaluation survey questionnaire will be completed for both the employer and customer. The results of the surveys will be data entered and used to monitor and assess the program. The surveys will be filed in the customer's case file.

The OJT Coordinator will monitor for the following: adherence to the training plan outline, adequacy of training supervision, competencies achieved or measured, wage rates and employee benefits provided, time and attendance, record keeping and invoicing procedures, actual start and end dates for the overall OJT contract and for each training component of the contract, observance of health and safety laws, quality of OJT placements by wage rates, job retention at the 30, and 60 day periods, and wage gains by occupation.

# XV. Program Performance

The OJT Coordinator will report to the Planning and Fiscal department as to appropriate expenditures of funds and operating budget, and to evaluate the Career Center plan against actual outcomes. Written and verbal reports will be presented to the Career Center Director, Workforce Investment Board Members and other parties involved as requested.

Title I Performance Measures for this program, established by the Workforce Investment Board, will be documented and tracked. It is expected that the customer will continue as an employee for a minimum of 26 weeks following the training period.

In summary, performance measures include; completion of training (course completion rate), placement in occupation related to training (entered employment rate), and placement at no less than the wage rate specified in the OJT contract (average placement wage). It should be noted that participants may be trained by one employer and ultimately be placed in a comparable training-related position with another employer.